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2 5855 Topanga Canyon Boulevard  
3 Suite 400  
4 Woodland Hills, California 91367  
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6 Attorneys for Cross-Complainant  
7 GERALD ARMSTRONG

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES

10  
11 CHURCH OF SCIENTOLOGY OF ) CASE NO.: 420 153  
12 CALIFORNIA, a California )  
13 corporation, ) REQUEST FOR PRODUCTION OF  
14 Plaintiff, ) DOCUMENTS PROPOUNDED TO  
15 vs. ) CROSS-DEFENDANT CHURCH OF  
16 GERALD ARMSTRONG, ) SCIENTOLOGY OF CALIFORNIA BY  
17 Defendants. ) CROSS-COMPLAINANT GERALD ARMSTRONG  
18 )  
19 )  
20 )  
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1 TO CROSS-DEFENDANT CHURCH OF SCIENTOLOGY OF CALIFORNIA AND TO  
2 ITS ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that pursuant to Code of Civil  
4 Procedure Section 2031, on September 4, 1984, at 10:00 a.m.  
5 at the Law Offices of Contos & Bunch, 5855 Topanga Canyon  
6 Boulevard, Suite 400, Woodland Hills, California,  
7 Cross-Complainant Gerald Armstrong requests Cross-Defendant  
8 Church of Scientology to produce for copying and inspection  
9 by counsel for Cross-Complainant each of the documents  
10 specified in Schedule A annexed hereto. Such items are  
11 believed to be in Cross-Defendant's custody, control or  
12 possession, not privileged, and relevant to the subject  
13 matter of this action or reasonably calculated to lead to the  
14 discovery of admissible evidence in this action.


15 PLEASE TAKE FURTHER NOTICE that, pursuant to the  
16 express provisions of Code of Civil Procedure Section 2031,  
17 Cross-Defendant Church of Scientology shall serve a written  
18 Response, subscribed under oath by an officer, director  
19 or managing agent of Church of Scientology, to this Request  
20 within twenty (20) days after service of this Request. Said  
21 sworn Response, pursuant to the requirements of Section  
22 2031(b), "shall identify the documents, papers, books,  
23 accounts, letters, photographs, objects, and tangible things  
24 falling within the categories specified in the request which  
25 are in the possession, custody or control of the responding  
26 party."

27 This Request calls for identification and produc-  
28 tion of, and defines "documents" to mean, without limitation,

1 the following items, whether printed or recorded or repro-  
2 duced by any other mechanical process, including audio and/or  
3 visual process, or written or produced by hand: agreements,  
4 communications, city, state and/or federal governmental  
5 proceedings and hearings, transcripts and reports, correspon-  
6 dence, telegrams, memoranda, summaries of records of tele-  
7 phone conversations or interviews, diaries, graphs, reports,  
8 notebooks, note charts, plans, summaries or records of  
9 meetings or conferences, summaries or reports of investiga-  
10 tions or negotiations, opinions or reports of counsel,  
11 consultants, photographs, tape recordings, cassettes, motion  
12 picture or television films, brochures, pamphlets, advertise-  
13 ments, circulars, press releases, articles, or any publica-  
14 tions, drafts, files, letters, any marginal comments appear-  
15 ing on any document, computer print-outs and all other  
16 writings, or printed materials.

17  
18 DATED: August 2, 1984.

19 CONTOS & BUNCH

20  
21 By:   
22 JULIA DRAGOJEVIC  
23 Attorneys for  
24 Cross-Complainant  
25 GERALD ARMSTRONG  
26  
27  
28

PROOF OF SERVICE BY MAIL

1  
2 STATE OF CALIFORNIA )  
3 COUNTY OF LOS ANGELES ) ss.

4 I am employed in the County aforesaid; I am over the  
5 age of eighteen years and not a party to the within entitled  
6 action; my business address is 5855 Topanga Canyon Boulevard,  
Suite 400, Woodland Hills, California, 91367.

On August 2, 1984, I served the within

7 REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED  
8 TO CROSS-DEFENDANT CHURCH OF SCIENTOLOGY OF  
9 CALIFORNIA BY CROSS-COMPLAINANT GERALD ARMSTRONG

10 on the parties in said action, by placing a true copy thereof  
11 enclosed in a sealed envelope with postage thereon fully prepaid,  
12 in the United States mail at Woodland Hills, California,  
addressed as follows:

13 Michael S. Magnuson, Esq.  
14 BARRETT S. LITT LAW OFFICES  
15 Paramount Plaza  
16 3500 Wilshire Boulevard  
Suite 1200  
Los Angeles, CA 90010

17 John G. Peterson, Esq.  
18 PETERSON & BRYNAN  
8530 Wilshire Boulevard  
Suite 407  
Beverly Hills, CA 90211

19  
20  
21  
22  
23  
24  
25  
26 I declare under penalty of perjury that the foregoing  
27 is true and correct.  
28 Executed on August 2, 1984, at Woodland Hills,  
California.

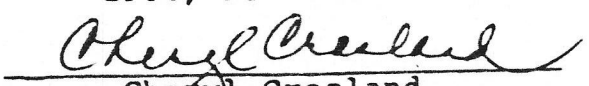
  
Cheryl Crosland

EXHIBIT D

SCHEDULE A

- 1  
2  
3 1. All originals and all copies of pre-clear or auditing  
4 files belonging to Gerald Armstrong.  
5
- 6 2. All originals and all copies of Guardians Office files  
7 pertaining to Gerald Armstrong.  
8
- 9 3. All originals and all copies of correspondence of the  
10 Guardians Office pertaining to Gerald Armstrong.  
11
- 12 4. All mission orders from the Guardians Office pertaining  
13 to Gerald Armstrong.  
14
- 15 5. All mission orders from the Guardians Office pertaining  
16 to Howard Shomer during May and June, 1984.  
17
- 18 6. All letters, memorandum, notes and orders pertaining to  
19 the Suppressive Person Declare Gerry Armstrong of April  
20 22, 1982, Flag Conditions Order 6664R.  
21
- 22 7. All letters, memorandum, notes and orders pertaining to  
23 the Suppressive Person Declare Gerry Armstrong of  
24 February 18, 1982, Flag Conditions Order 6664R.  
25
- 26 8. All invoices or receipts and/or other documents reflect-  
27 ing or relating to payment made by Gerald Armstrong for  
28 Church of Scientology publications.

EXHIBIT D

- 1 9. All invoices or receipts and/or other documents reflect-  
2 ing or relating to payment made by Gerald Armstrong for  
3 auditing.  
4
- 5 10. All invoices or receipts and/or other documents reflect-  
6 ing or relating to payment made by Gerald Armstrong for  
7 courses.  
8
- 9 11. All correspondence between Eugene M. Ingram and repre-  
10 sentatives of the Church of Scientology of California  
11 regarding Gerald Armstrong and/or the Armstrong litiga-  
12 tion.  
13
- 14 12. All correspondence between Eugene M. Ingram and repre-  
15 sentatives of the Church of Scientology of California  
16 regarding Michael Flynn and/or the Armstrong litigation.  
17
- 18 13. Any communication or correspondence and/or other docu-  
19 mentation between representatives of Author Services,  
20 Inc., and representatives of the Church of Scientology  
21 of California regarding Gerald Armstrong and/or the  
22 Armstrong litigation.  
23
- 24 14. All documentation which supports the allegations  
25 numbered 1 through 18 on page one of the Suppressive  
26 Person Declare Gerry Armstrong, as revised on April 22,  
27 1982.  
28 ///

1 15. All documentation which supports the allegations of the  
2 April 22, 1982 Suppressive Person Declare Gerry  
3 Armstrong as follows:

4  
5 (a) That Gerald Armstrong "has spoken out for LSD and  
6 LSD-proponent Timothy Leary.

7  
8 (b) That "Gerry Armstrong has degraded LRH's reserach  
9 and prefers to promote the research of Timothy  
10 Leary."

11  
12 (c) That Gerald Armstrong "falsified his Church finan-  
13 cial records by failing to state the nature of the  
14 intended purchases and failing to spend the money  
15 for the approved items."

16  
17 (d) That "altered documents have been found in his  
18 area."

19  
20 DATED: August 2, 1984.

21 CONTOS & BUNCH

22  
23 BY: 

24 JULIA DRAGOJEVIC  
25 Attorneys for  
26 Cross-Complainant  
27 GERALD ARMSTRONG  
28

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